

FREEMAN, NOOTER & GINSBERG

ATTORNEYS AT LAW

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December 27, 2019

Honorable Paul G. Gardephe  
United States District Judge  
Southern District of New York  
Thurgood Marshal Courthouse  
40 Foley Square  
New York, NY 10007

**MEMO ENDORSED** 608-0808  
TELECOPIER (212) 962-9696

**The Application is granted.**

**SO ORDERED:**

*Paul G. Gardephe*  
Paul G. Gardephe, U.S.D.J.

Dated: *Dec. 30, 2019*

CONSENT LETTER MOTION

RE: United States v. Tonya Thomas (Rose, et al), 19 Cr. 789 (PGG)

Your Honor:

I am writing to request a one-time modification of my client's bail conditions.

My client is currently released on a PRB with two co-signers, and her travel limits include the Southern and Eastern District of New York

My application is that the Court grant permission for her to travel to Wild Creek, Pennsylvania on December 31, 2019, returning to New York on January 1, 2020 (two days and one night) so that she can be with friends on New Year's Eve.

I communicated this request to AUSA Matthew Andrews and he has no objection if Pre-Trial has no objection. I communicated with Pre-Trial Officer Francesca Tessier-Miller who responded to me that she has no objection.

Thus, I request that Ms. Thomas be allowed to travel to Wild Creek, Pennsylvania on December 31, 2019, to return on January 1, 2020, and that all other conditions of her bail bond remain the same.

Thank you.

Sincerely,

/s/ Thomas H. Nooter

Thomas H. Nooter  
Attorney for Defendant

cc: AUSA Matthew Andrews, by ECF and email  
PTSA Francesca Tessier-Miller, by email